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Secretary,
Federal Communications Commission
Washington D.C., 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Reference: 92-235

Submitted By: MOUNTAIN RESCUE ASSOCIATION
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The Mountain Rescue Association, a volunteer, non-profit organization dedicated to saving lives through rescue and mountain safety education makes the following brief comments on the proposed Part 88 rules as contained in Docket 92-235.

We believe that there is a need for better spectrum efficiency and the new channels which it will produce.

We are concerned with the time table proposed to implement the proposed changes, especially those which will reduce transmitter deviation in existing stations by 1996. The proposed reduction in the deviation of VHF transmitters will reduce the intelligibility and effective range of the signal unless changes are made to the receiver circuits to recover there reduced audio. We have been unable to obtain assurance from equipment manufacturers that they will produce a "narrow-banding" kit for our existing radios. Our communications rely on low power hand held radios operating over long distances in mountainous terrain. Any reduction in the effective range will severely hamper our operations and jeopardize the safety of our rescue teams.

We suggest that the implementation schedule for reducing the channel spacing be delayed until such time as manufacturers commit to producing narrow-banding kits, or until the proposed second phase takes effect in 2004. By that time our units will be able to have raised funds to purchase new equipment which will meet the new standards.

We operate on the frequency of 155.160 MHz as do many other rescue organizations and law enforcement agencies for the purpose of search and rescue coordination. We note that in the proposed frequency allocation schedule the 155.160 MHz frequency has been assigned to the non-commercial pool rather than the Public Safety pool.

We suggest that the 155.160 MHz frequency be reassigned to the Public Safety allocation pool. An acceptable and preferred alternative would be to establish a new frequency set aside nation wide for the exclusive use of search and rescue coordination within the Public Safety allocations. It is not practical to coordinate field operations using low powered transmitters on frequencies shared by high powered bases and mobiles of other users.

Michael A. Norman
Michael A. Norman, Communications Chairman

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